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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 WASHOE COUNTY, a political subdivision of
11 the State of Nevada,

12 Plaintiff,

13 v.

14 LOUIS DEJOY, *in his official capacity as*
15 *Postmaster General of the United States*, and the
UNITED STATES POSTAL SERVICE,

16 Defendants.

Case No. 3:24-cv-00224-ART-CSD

Stipulation and Order to Extend
Defendants' Answering Deadline
(Third Request)

17 Pursuant to LR IA 6-1, the parties stipulate that Defendants' deadline to answer or
18 otherwise respond to Plaintiff's Complaint (ECF No. 1) will be extended by twenty-two
19 days, from September 30, 2024, to and including October 22, 2024. The reasons for this
20 stipulation are as follows.

21 1. On May 28, 2024, Plaintiff filed its Complaint in this matter, alleging, among
22 other things, that the U.S. Postal Service acted *ultra vires* by implementing the network
23 optimization phase of its "Delivering for America" plan without first seeking an advisory
24 opinion from the Postal Regulatory Commission. Plaintiff also challenged the Postal
25 Service's plans to move certain processing operations from Reno to Sacramento. *See*
26 Compl. ¶¶ 68–69.

27 2. On August 22, 2024, the Postal Service filed a "notice of pre-filing
28 conference" with the Postal Regulatory Commission regarding its intent to seek an advisory

1 opinion on its plans to transform its processing and transportation networks. Specifically,
2 the Postal Service intends to seek an advisory opinion its plans to “create a network of
3 Regional Processing and Distribution Centers or Campuses (RPDCs) and Local Processing
4 Centers (LPCs)” and to “implement on a nationwide basis the Regional Transportation
5 Optimization (RTO) initiative.” *Id.* at 3. The notice also states that “with respect to the
6 mail processing facility reviews (MPFRS) that the Postal Service conducted in preparation
7 for implementing certain of the changes,” which would include the MPFR for the Reno
8 facility, there will be “no additional movement of processing operations associated with
9 these MPFRS . . . until January 2025 at the earliest.” *Id.* at 6.

10 3. The Postal Service held a pre-filing conference on September 5, 2024. The
11 Postal Service has not yet, however, filed its request for an advisory opinion.

12 4. Additionally, on August 27, 2024, the Postal Service announced that the
13 Reno Postal facility will continue certain local originating mail processing operations.

14 5. In light of these developments, the parties believe that it is in the interest of
15 judicial economy to extend Defendants’ answer deadline to and including October 22, 2024,
16 to allow the parties time to review the Postal Service’s request for an advisory opinion once
17 it is filed and to discuss possible next steps in this case in light of that request.

18 6. This is the third stipulation to extend time for Defendants to answer or
19 otherwise respond to the complaint.

1 IT IS SO STIPULATED.

2 Dated: September 25, 2024

3 CHRISTOPHER J. HICKS BRIAN M. BOYNTON
4 Washoe County District Attorney Principal Deputy Assistant Attorney General

5 LINDSAY L. LIDDELL JOSEPH E. BORSON
6 Deputy District Attorney Assistant Director

7 /s/ Lindsay L. Liddell
8 Attorney for Plaintiff

/s/ John Robinson
Attorney for Defendants

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11 IT IS SO ORDERED.

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15 United States Magistrate Judge

16 DATED: September 26, 2024
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